



**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

Patent Application of ) **MAIL STOP AF**  
Srikanth Natarajan et al. )  
Application No.: 09/838,205 ) Group Art Unit: 2145  
Filed: April 20, 2001 ) Examiner: TANIM M HOSSAIN  
For: METHOD AND SYSTEM FOR ) Confirmation No.: 9389  
IDENTIFYING EVENT SOURCE IN )  
DUPLICATE IP NETWORKS )  
)

**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In response to the final Office Action dated March 8, 2006, a Notice of Appeal is filed herewith, and a Pre-Appeal Conference is requested to review the above-identified application. No amendments are being filed with this request. For at least the following reasons, the rejections raised in the Final Office Action are clearly improper and without basis.

**OVERVIEW**

Independent claims 1 and 7 are allowable over U.S. Patent 6,425,008 (Lecheler et al.). The Lecheler et al. patent does not teach or suggest Applicants' claimed features of: (1) deriving, by at least one management computer, an identification of at least one collection computer from an identifier tag based on a domain name; and (2) identifying to a user the source of the event using the identification of the at least one collection computer, the at least one collection computer being at least one of a collection computer and a group of collection computers. Independent claims 1 and 7 are therefore allowable.

## **ARGUMENT**

### **1. The Examiner Has Failed To Establish That The Lecheler et al. Patent Teaches Each and Every Element of Independent Claims 1 and 7.**

On page 2 of the Office Action, independent claims 1 and 7, along with various dependent claims, are rejected as being anticipated by U.S. Patent No. 6,425,008 (Lecheler et al.). This rejection is respectfully traversed.

Applicants have disclosed that when a management computer receives event information including the identifier tag and when the management computer needs to display or use the source of an event, the management computer can, for example, derive the domain name of the collection computer from the identifier tag contained in the event (see, e.g., the specification at paragraph [0024]). The identifier tag can be, for example, the name or domain name of the at least one collection computer, even if there is a group of collection computers sharing a like identity (e.g., specification at paragraph [0019]). As exemplified in Fig. 1, more than one collection computer (e.g., 120 and 125) can monitor a single event from a single domain (CO) to identify the source of an event in a computer network.

The foregoing features are broadly encompassed by claims 1 and 7. For example, the Lecheler patent does not disclose or suggest "deriving, by the at least one management computer, an identification of at least one collection computer from the identifier tag based on a domain name; and identifying to a user the source of an event using the identification of the at least one collection computer, the at least one collection computer being at least one of a collection computer and a group of collection computers," as recited in claim 1, and as similarly cited in claim 7.

The Lecheler patent discloses remote management of private networks having duplicate network addresses (title). As shown in Fig. 1, no duplicate pairs of network identifiers 16 are assigned to a common Level 1 manager 34. The Lecheler patent therefore cannot teach or suggest a collection of computers sharing a like identity, "the at least one collection computer being at least one of a collection computer and a group of collection computers," as recited in claim 1, and as similarly cited in claim 7.

Further, the Lecheler patent uses a level one manager 34 to detect errors within a customer domain 12, and to produce an error signal as well as a unique location identifier (which identifies a location of the error). See column 4, lines 15-42. However, because of the hierarchical connections between the private networks 16, level one manager 34 and the level 2 manager 40, only one level one manager 34 is able to report an event from a given private network 16. A unique identification of the source of the event is not resolved at a management computer by deriving a common identity (e.g., a domain name) of the at least one collection computer reporting the event, as recited in claim 1, and as similarly cited in claim 7..

For the foregoing reasons, Applicant's claims 1 and 7 are allowable over the Lecheler patent. The remaining claims depend from independent claim 1 and recite additional advantageous features which further distinguish over the document relied upon by the Examiner. As such, the present application is in condition for allowance.

2. The Examiner Has Failed To Establish A Prima Facie Case of Obviousness Based on the Lecheler et al. Patent To Reject dependent Claims 4 And 5.

On page 4 of the Office Action, dependent claims 4 and 5 are rejected as being unpatentable over the Lecheler patent. This rejection is respectfully traversed. Claims 4 and 5 depend from claim 1. For the like reasons as set forth above, and for the additional features they recite, the Lecheler et al. patent does not teach or suggest identification of the at least one collection computer and a network address of a network element that generated the event, as recited in claim 4, and as similarly recited in claim 5.

### **CONCLUSION**

The Examiner has failed to establish that the Lecheler et al. patent teaches each and every element of independent claims 1 and 7; and has not established a prima facie case of obviousness in rejecting dependent claims 4 and 5. A reversal of the final rejection, and allowance of the present application, are therefore requested.

Respectfully submitted,

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